

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JOHN HEBAL, JR. : CASE NO. 5-20-00284
Debtor : CHAPTER 13

JOHN HEBAL, JR. :
Movant, :
vs. :
PNC BANK, NATIONAL ASSOCIATION :
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, John Hebal, Jr., the Debtor, and files an Answer to PNC Bank, NA's
Motion for Relief From the Automatic Stay:

1. John Hebal, Jr. (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor fell behind on payments to the Movant.
4. The Debtor wishes to enter into a Stipulation to include the arrears in an amended Plan.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

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WHEREFORE, the Debtors respectfully request that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: October 26, 2020

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 26, 2020, he caused a true and correct copy of
Debtors' Answer to PNC Bank's Motion for Relief from the Automatic Stay to be served Via First Class
United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Rebecca A. Solarz, Esquire at rsolarz@kmlawgroup.com

Dated: October 26, 2020

/s/Tullio DeLuca
Tullio DeLuca, Esquire